

Dr. David Robert Salter  
1315 Naylor Court. NW  
Washington, DC, 20001

Feb 20<sup>th</sup> , 2020

DC Board of Zoning Adjustment  
441 4<sup>th</sup> St NW Suite 200S  
Wash, DC 20001  
[bzasubmissions@dc.gov](mailto:bzasubmissions@dc.gov)

RE: Case No 20211 – 934 O St NW & Naylor Court NW

*“Application of Opal, LLC, pursuant to 11 DCMR Subtitle X, Chapter 9, for special exceptions under the use provisions of Subtitle U § 301.1(g), and under Subtitle E § 5201 from the accessory structure rear yard setback requirements of Subtitle E § 5004.3, and pursuant to 11 DCMR Subtitle X, Chapter 10, for **an area variance from the lot occupancy requirements of Subtitle E § 304.1, to construct a second floor addition to an existing carriage house** in the RF-1 Zone at premises 934 O Street N.W. (Square 367, Lot 843).”*

Dear DC Board of Zoning Adjustment,

I am writing an unsolicited letter of support for the proposed construction by OPaL, LLC at the rear of 934 O Street NW, a structure facing the west alley section of Naylor Court NW – an “H” alley. My wife and I have lived in Naylor court for 16 years. I have a long history of activism within historic preservation as I sought to protect the alley structures (especially stables) that were being demolished by developers. My blog - <http://preservingdcstables.blogspot.com> – highlights this journey. My work on alley preservation in part, helped lead to the publication of the HPO DC Historic Alley Buildings Survey ( <https://planning.dc.gov/publication/dc-historic-alley-buildings-survey>). My contributions were acknowledged at the end of their document. I feel competent to comment on this issue both as a longtime resident with a vested interest in the neighborhood and as someone who has researched and written about DC alleys for a long time.

*“The HPO would also like to acknowledge Dr. David Salter who shared his vast knowledge on alley history and alley revitalization with the office and continues to send articles, blog posts, and other information on alley happenings across the country and in Canada. Dr. David Salter has his own blog, PreservingDCStables and ..., a resident of Blagden Alley/Naylor Court. His alley research and interest in alley building preservation and revitalization has inspired this study and will continue to inform the office in its future alley studies and projects.”*

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Board of Zoning Adjustment  
District of Columbia  
CASE NO.20211  
EXHIBIT NO.35

I have known Sean Ruppert (principal and managing member of OPaL LLC) for about 5 years beginning with his large new build project in Naylor Court (Naylor Court Stables). This is an award winning project that has drawn admiration from all who walk through the alley. I have overhead young people walking through the alley claim that this was an excellent “restoration” not recognizing it was entirely new. OPaL paid meticulous attention to detail in the work leading up to the final product concept and its execution. It fits beautifully into the fabric of the alley. Sean has an excellent sense of place, purpose and performance within the construct of historic sensibilities. I have every confidence that Sean and OPaL will bring these qualities to his work at 934 O Street and especially with the building at its rear.



Naylor Court Stables (OPaL, LLC)

It is a little unusual to see the entirety of a property such as 934 O Street NW from its “side view” rather than the usual restricted rear view. Because of this, it is important to get the massing and concept of this project exactly right because of the visual prominence of the structure as seen from O Street at the entrance to the alley. The proposal from OPaL conforms to the concept of a “mews” with a flow of homogeneity and synergy through the length of the alley.

Having a second floor on the former garage “set back” not only reduces the functionality of the building, it also clashes with the symmetry of the other buildings in the alley. Maximizing livable space in this project is well within the newly embraced spirit of accessory dwelling units in Washington DC. I believe that a second floor set back would be a misguided enforcement of “code” and “guidelines” within HPO and BZA. Doing this would have a “jarring visual effect” as one enters the alley and not at all consonant with the appearance of the other buildings.





Massing perspective in Naylor Court looking south from O Street NW

The arguments laid out in OPaL's request for approval of their request for variance are well articulated. I support all of them as outlined in the 14 elements extracted below. I support his request for Area Variance and Special Exception to make this project work as it should.

The OPaL project as proposed will greatly enhance the appearance of Naylor Court, the residential sister alley to the commercial alley of Blagden. We look forward to seeing the plans become reality.

Yours sincerely,

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1. This application is made by OPaL, LLC (the “Applicant”) for special exception and variance relief to allow for the expansion of an accessory building for residential purposes as a second dwelling unit.
2. The Applicant plans to create the second dwelling unit by retaining the existing garage structure, and adding on a second story within the same footprint to then convert the entire structure for residential use (the “Project”), as shown in the attached plans and drawings (the “Plans”).
3. As such, the Project presents an opportunity to make use of the existing structure and footprint of an underutilized accessory building by adding onto it in order to create a family-sized dwelling unit appropriate for the character of the Property’s residential neighborhood.
4. Since the alley to the west is 30 feet wide, no centerline setback is required.
5. The proposed second dwelling unit in the accessory building will have permanent access to and from the 30-foot wide improved public alley to its west, which connects with O Street NW.
6. The Requested Special Exceptions are in Harmony with the General Purpose and Intent of the Zoning Regulations and Zoning Maps and Will Not Adversely Affect or Impact Surrounding Areas
7. Furthermore, because the Project must be approved by the HPRB, its massing and design will be assessed for its compatibility with the neighborhood.
8. The applicant must demonstrate that: (i) the property is affected by an exceptional or extraordinary situation or condition; (ii) that the strict application of the Zoning Regulations will result in a practical difficulty to the applicant; and (iii) that the granting of the variance will not cause substantial detriment to the public good or substantially impair the intent, purpose, or integrity of the zone plan.
9. These characteristics combine to create an exceptional condition affecting the Property, and no other property nearby shares all three traits. First, the Property is improved with the principal building that is a contributing building in both the Shaw and Naylor Court/Blagden Alley Historic Districts. This means that the principal building cannot be demolished to reduce lot occupancy on the Property.



10. ... prominence of the Property and the garage in particular with respect to Naylor Court (the adjacent alleys) means that any development will have particular importance with respect to its appearance from the historic public alley. Put another way, the development on the Property will be visible in a way that is unusual for historic alleys since this alley is so wide and the garage is located along the widest part of the alley system in the square that runs along the Property's full length.
11. If the addition had to conform to lot occupancy, then it would have to lose approximately 618 square feet, which would result in an addition of only 159 square feet that would render the addition infeasible for creating a functional second story and a reasonably desirable home. With a conforming lot occupancy, both of the second-floor bedrooms would be lost since both the stairs and even one bedroom could not be accommodated in 159 square feet. A bedroom could not be accommodated at the ground floor since the dwelling must provide the kitchen/living area and parking space on the first floor; the existing garage – at approximately 777 square feet – would be unable to reasonably accommodate
12. Many pedestrians traverse Naylor Court, and the proposed addition will be highly visible from many vantage points due to its parallel orientation to the wide alley. Under applicable historic regulations, the design of the proposed addition must be compatible with the character of the historic district. Compatibility in this instance takes on a greater meaning.
13. The design of most alley buildings in historic Naylor Court are simple and utilitarian in form and uniform in their footprint, meaning that it is rare – if ever the case – that alley buildings recess or taper at their second stories. Designing the second story addition to have a smaller footprint than the existing garage would be inconsistent with the design of other surrounding alley buildings
14. Put simply, a second-story addition that has a smaller footprint than the existing building below would be inconsistent with the other alley buildings in the Naylor Court/Blagden Alley Historic District.

**Relief from section(s):** 11-E 5004.1; 304.1; 11-U 301.1(g)

**Type of Relief:** Area Variance, Special Exception

**Brief description of proposed project:** The Applicant plans to adaptively reuse both existing buildings by converting the principal building into a single-family row dwelling, and constructing a vertical addition to the accessory garage in order to convert it into a second dwelling unit.



**Present use of Property:** The Property is improved with a principal two-story residential building that currently contains three units, and an accessory one-story garage at the rear.

**Proposed use of Property:** The expansion of an accessory building for residential purposes as a second dwelling unit.

VIEW FROM ALLEY TOWARD CARRIAGE HOUSE



### Characteristics of a typical mews



1. Roofs & party-wall upstands
2. Chimney stacks & pots
3. Timber sash windows
4. Winch brackets
5. Winch doors
6. Unpainted brickwork, including arches & stone sills
7. Cast-iron vents, gutters, hopper-heads and downpipes
8. Timber bressumers
9. Coach doors
10. Coach doors' structural openings
11. Entrance doors and lights
12. Street paving, including drainage layout
13. Corbelling, brick details, decorative features
14. Cast-iron or stone bollard
15. Street paving, including drainage layout
16. Brick pointing

Source: Westminster City Council Planning Department

## Defining a "Mews"

The concept of a 'mews' is somewhat foreign to Americans and can be a little difficult to articulate. In Rosen and Zuckermann's *The Mews of London*<sup>[1]</sup> the concept of a mews is beautifully described as follows:-

*"The mews of London," wrote Henry Mayhew in 1851, "constitute a world of their own. They are tenanted by one class – coachmen and grooms, with their wives and families – men who are devoted to one pursuit, the care of horses and carriages; who live and associate one among another; whose talk is of horses (with something about masters and mistresses) as if to ride or to drive were the great ends of human existence.*

*Today, well over a hundred years later, the mews still constitute "a world of their own". Although the horses are gone, a vast maze of former stable blocks, rich in history and architectural oddities, remains. There are over six hundred of them left in modern London, most of them having no pedestrian footpath on either side; they are lined with small cottages, mostly Victorian two-storey houses; they were almost all former stables, and many still have their original stable doors and coach-house hardware; many are hidden from the glance of the casual passerby, and are entered through arches or discrete gateways, often set unobtrusively into a building façade. Though mews are to be found occasionally in other cities, their substantial number here makes them one of the factors which distinguishes London from other great cities in the world.*

The term "mews" appears to  
Charing Cross, which was built on  
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come from the Royal Mews at  
the site where the king's hawks were  
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*formerly “mewed”. This meant that the birds were kept in a cage or mew at moulting time, the time they shed or changed their feathers.(the word derives from the French muer, to moult which in turn comes from the Latin mutare, to change). The Royal Mews was turned into a stable for horses in the sixteenth century during the reign of Henry VIII, and its new meaning ‘a set of stabling grouped around a yard or alley’ was certainly known in the seventeenth century.”*

<https://preservingdcstables.blogspot.com/2010/11/defining-mews.html>

<https://preservingdcstables.blogspot.com/2013/12/london-mews-as-they-were.html>



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